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Filing date: **07/10/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221859
Party	Defendant Jeremiah A Walker
Correspondence Address	JEREMIAH A WALKER 394 chase marion way mcdonough, GA 30253 UNITED STATES sharronbrn@yahoo.com
Submission	Answer
Filer's Name	Jeremiah Walker
Filer's e-mail	sharronbrn@yahoo.com
Signature	/jw/
Date	07/10/2015
Attachments	answer to opposition 3.pdf(131158 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

COLUMBIA INSURANCE COMPANY	:	
	:	
Opposer,	:	Opposition No.: 91221859
	:	
v.	:	Application SN 86/200, 985
	:	
JEREMIAH A. WALKER	:	Mark: ABB ALMAMADA BRED
	:	WINNER BORN KING
Applicant.	:	CLOTHING CO. & DESIGN

ANSWER TO NOTICE OF OPPOSITION

Jeremiah A. Walker ("Applicant") answers Columbia Insurance Company's ("Opposer") Notice of Opposition as follows:

1. Applicant denies having knowledge or information sufficient enough to form a belief as to the allegations contained in paragraph numbered "1" and, therefore, denies the allegations therein.
2. Applicant denies having knowledge or information sufficient enough to form a belief as to the allegations contained in paragraph numbered "2" and, therefore, denies the allegations therein.
3. Opposer cites U.S. Trademark Registrations, the records of which are the best evidence of their content; therefore, reference is hereby made to same. Except as admitted, denied.
4. The allegations contained in paragraph numbered "4" are admitted except that Applicant's current address is 394 Chase Marion Way, McDonough, GA 30253.
5. The allegations contained in paragraph numbered "5" are admitted.
6. The allegations contained in paragraph numbered "6" are admitted.
7. Applicant denies having knowledge or information sufficient enough to form a belief as to the allegations contained in paragraph numbered "7" and, therefore, denies the allegations therein.

8. Opposer cites U.S. Trademark Registrations, the records of which are the best evidence of their content; therefore, reference is hereby made to same. Except as admitted, denied.
9. Opposer cites U.S. Trademark Registrations, the records of which are the best evidence of their content; therefore, reference is hereby made to same. Except as admitted, denied.
10. Applicant makes no answer to the allegations contained in paragraph numbered "10" to the extent that the allegations therein state legal conclusions rather than facts. Further, Applicant denies having knowledge or information sufficient enough to form a belief as to each and every allegation contained in paragraph numbered "10" and, therefore, denies the allegations therein.
11. Applicant makes no answer to the allegations contained in paragraph numbered "11" to the extent that the allegations therein state legal conclusions rather than facts. Further, Applicant denies having knowledge or information sufficient enough to form a belief as to each and every allegation contained in paragraph numbered "11" and, therefore, denies the allegations therein.
12. Applicant makes no answer to the allegations contained in paragraph numbered "12" to the extent that the allegations therein state legal conclusions rather than facts. Further, Applicant denies having knowledge or information sufficient enough to form a belief as to each and every allegation contained in paragraph numbered "12" and, therefore, denies the allegations therein.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

13. Applicant affirmatively alleges that there is no likelihood of confusion, mistake or deception because, *inter alia*, Applicant's marks and the pleaded marks of Opposer are not confusingly similar.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

14. Applicant affirmatively alleges that there is no likelihood of confusion, mistake or deception because, *inter alia*, Applicant's marks and the pleaded marks of Opposer are not confusingly similar. Any similarity, if at all, between Applicant's mark and the pleaded marks of Opposer is in the portion "Born" which Applicant has not, is not and will not display on any of the opposed goods exclusively and/or separate from Applicant's mark in its entirety.

WHEREFORE, Applicant requests that the Notice of Opposition be dismissed in its entirety.

Dated: June 27, 2015
McDonough, GA

Respectfully submitted,

Jeremiah A. Walker

JEREMIAH A. WALKER
Applicant
394 Chase Marion Way
McDonough, GA 30253
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION** has been served upon opposing counsel by mailing said copy on July 6, 2015, via First Class Mail, postage prepaid, with a courtesy copy via email:

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Jeremiah A. Walker

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